1539

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	Criminal No. 15-110
v.	)	
	)	18 U.S.C. §§ 1832(a)(2) and
	)	(a)(4)
THOMAS RUKAVINA	)	
	)	

INDICTMENT

COUNT ONE

The grand jury charges:

On or about June 19, 2014, in the Western District of Pennsylvania, the defendant, THOMAS RUKAVINA, with the intent to convert a trade secret to the economic benefit of persons other than the trade secret's owner, namely PPG Industries, and knowing and intending that the offense will injure PPG Industries, did knowingly and without authorization copy, duplicate, photocopy, replicate, transmit, deliver, send, communicate, and convey a trade secret, and attempt to do so, specifically, a document entitled the "NTP Casting Process for G650 Cabin Window," which was related to a product and service used and intended for use in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1832(a)(2) & (a)(4).

CRIMINAL FORFEITURE ALLEGATIONS

The United States re-alleges and incorporates by reference the allegations contained in Count One of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2323.

1. The United States hereby gives notice to the defendant, THOMAS RUKAVINA, as charged in Count One in this Indictment, that, upon his conviction of such offense, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 2323, which requires any person convicted of such offense to forfeit any property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offense, including but not limited to the following:

a. $18,072.79 in United States currency which is currently in the form of a Cashier's Check through PNC Bank.

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant, THOMAS RUKAVINA:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of such defendant THOMAS RUKAVINA up to the value of the forfeitable property described in this forfeiture allegation.

A true bill,

FOREPERSON

DAVID J. HICKTON
United States Attorney
PA ID No. 34524